

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

---

MARY A. FROEHLICH,

Plaintiff

v.

VERIZON, INC. and MUTUAL OF OMAHA  
INSURANCE COMPANY,

Defendants.

---

CIVIL ACTION NO. 05-564 (SLR)

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*  
PURSUANT TO LOCAL DISTRICT COURT RULE 83.5**

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of Edward F. Rooney, Esquire (the “Admittee”), of the law firm Eckert Seamans Cherin & Mellott, LLC, One International Place, 18<sup>th</sup> Floor, Boston, MA 02110-2602. The Admittee will represent Mutual Of Omaha Insurance Company in the above-captioned Proceeding.

/s/ Margaret F. England  
Karen L. Turner, Esquire (No. 4332)  
Margaret F. England (No. 4248)  
Eckert Seamans Cherin & Mellott, LLC  
4 East 8<sup>th</sup> Street, Suite 200  
Wilmington, DE 19801  
Telephone: (302) 425-0430  
Fax: (302) 425-0431  
E-mail: [mengland@eckertseamans.com](mailto:mengland@eckertseamans.com)

Of Counsel:  
Edward Rooney, Jr., Esquire  
Eckert Seamans Cherin & Mellott, LLC  
One International Place, 18<sup>th</sup> Floor  
Boston, MA 02110-2602  
Telephone: (617) 342-6863-8400  
E-mail: [erooney@eckertseamans.com](mailto:erooney@eckertseamans.com)  
*Attorney for Omaha Mutual Insurance Company*

Dated: August 24, 2005

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

---

MARY A. FROEHLICH,

Plaintiff

v.

VERIZON, INC. and MUTUAL OF OMAHA  
INSURANCE COMPANY,

Defendants.

---

CIVIL ACTION NO. 05-564 (SLR)

**CERTIFICATION OF COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of Massachusetts and New York and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

Dated: August 24, 2005

/s/ Edward Rooney, Jr  
Edward Rooney, Jr., Esquire  
Eckert Seamans Cherin & Mellott, LLC  
One International Place, 18<sup>th</sup> Floor  
Boston, MA 02110-2602  
Telephone: (617) 342-6863-8400  
E-mail: [erooney@eckertseamans.com](mailto:erooney@eckertseamans.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

---

MARY A. FROEHLICH,

Plaintiff

v.

VERIZON, INC. and MUTUAL OF OMAHA  
INSURANCE COMPANY,

Defendants.

---

)  
)  
)  
)  
) CIVIL ACTION NO. 05-564 (SLR)  
)  
)  
)  
)  
)  
)

**ORDER GRANTING MOTION**

**IT IS HEREBY ORDERED** that counsel's motion for admission *pro hac vice* is granted.

Dated: August \_\_\_\_, 2005

---

The Honorable Sue L. Robinson  
United States District Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I am not less than 18 years of age and that on this 24<sup>nd</sup> day of August 2005, I caused a true and correct copy of the Motion and Order for Admission *Pro Hac Vice* upon the following via United States first class regular mail postage prepaid:

Charles Gruver, III  
Charles Gruver III, P.A.  
724 Yorklyn Road, Suite 315  
Hockessin, DE 19707

Michael J. Salmanson  
Salmanson Goldshaw, P.C.  
2 Penn Center, Suite 1230  
Philadelphia, PA 19102

Stephen J. Neuberger  
The Neuberger Firm, P.A.  
2 East Seventh Street, Suite 302  
Wilmington, DE 19801

Scott B. Goldshaw  
Salmanson Goldshaw, P.C.  
2 Penn Center, Suite 1230  
Philadelphia, PA 19102

/s/ Margaret F. England  
Margaret F. England (No. 4248)  
Eckert Seamans Cherin & Mellott, LLC  
4 East 8<sup>th</sup> Street, Suite 200  
Wilmington, DE 19801  
Telephone: (302) 425-0430  
Fax: (302) 425-0431  
E-mail: [mengland@eckertseamans.com](mailto:mengland@eckertseamans.com)